

JACK ESKENAZI)
d/b/a AMERICAN HEALTHCARE CAPITAL) CIVIL ACTION NO.:
)
Plaintiff,)
)
4:18-cv-00307-SRB
v.)
)
RURAL COMMUNITY HOSPITALS OF)
AMERICA, LLC, EMPOWER HEALTHCARE,)
LLC, RURAL HEALTH PARTNERS, LLC,)
PAUL L. NUSBAUM and JORGE PEREZ,)
)
Defendants.)
)

COME NOW Defendants Rural Community Hospitals of America, LLC, Empower Healthcare, LLC, Rural Health Partners, LLC, Paul L. Nusbaum and Jorge Perez (“Defendants”), by and through counsel, and hereby move for an Order dismissing Plaintiff’s First Amended Complaint [Doc. #31] pursuant to Fed. R. Civ. P. 12(b)(2), Fed. R. Civ. P. 12(b)(3) and Fed. R. Civ. P. 12(b)(6), and/or for a more definite statement pursuant to Fed. R. Civ. P. 12(e). Defendants’ Suggestions in Support of this Motion to Dismiss are contemporaneously filed herewith.

Respectfully submitted,

Page 1 of 2
Case 4:18-cv-00307-SRB Document 32 Filed 08/14/18 Page 1 of 2

By: /s/ Lauren A. Horsman

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HEALTHCARE, LLC, RURAL HEALTH
PARTNERS, LLC, PAUL L. NUSBAUM
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HEALTHCARE, LLC, RURAL HEALTH
PARTNERS, LLC, PAUL L. NUSBAUM
AND JORGE PEREZ
Petition for Admission Pro Hac Vice pending

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of August, 2018, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, a true copy of the foregoing to be furnished via CM/ECF to all counsel of record.

/s/ Lauren A. Horsman